

Presentment Date: September 21, 2017 at 12:00 noon (ET)

Objection Deadline: September 18, 2017 at 4:00 p.m. (ET)

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Michael A. Rollin

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*Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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)	
In re)	Chapter 11 Case No.
)	
Lehman Brothers Holdings Inc., <u>et al.</u> ,)	08-13555 (SCC)
)	
Debtors.)	Jointly Administered
)	
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**NOTICE OF PRESENTMENT OF MOTION
OF LEHMAN BROTHERS HOLDINGS INC.
PURSUANT TO FED. R. BANKR. P. 9019 AND 11 U.S.C. § 105(A) FOR
APPROVAL OF STIPULATION AND AGREED ORDER BETWEEN
LEHMAN BROTHERS HOLDINGS INC. AND NEW RESIDENTIAL
INVESTMENT CORP. REGARDING SETTLEMENT OF CLAIMS**

PLEASE TAKE NOTICE that the undersigned will present the annexed motion (the “Motion”) of Lehman Brothers Holdings Inc. (the “Plan Administrator”), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors*, on behalf of itself and the other affiliated debtors in the above-captioned cases (collectively, the “LBHI Debtors”), pursuant to section 105(a) of the Bankruptcy Code and

Rule 9019 of the Federal Rules of Bankruptcy Procedure, for approval of that certain stipulation and agreed order between Lehman Brothers Holdings Inc. and New Residential Investment Corp. regarding settlement of claims, all as more fully described in the Motion, to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for approval and signature on **September 21, 2017 at 12:00 noon (prevailing Eastern Time)**. Capitalized terms used but not defined herein have the meanings given to them in the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed electronically in text searchable portable document format (PDF) with the Court in accordance with General Order M-399 (General Order M-399 can be found at www.nysb.uscourts.gov, the official website for the Court), by registered users of the Court's case filing system and by all other parties in interest (with a hard copy delivered directly to the Judge's Chambers), and be served in accordance with General Order M-399, and upon: (i) the Chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 23; (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Paul V. Shalhoub, Esq. and Todd G. Cosenza, Esq.) and Rollin Braswell Fisher LLC, 8350 East Crescent Parkway, Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq. and Maritza D. Braswell, Esq.), attorneys for LBHI and certain of its affiliates; (iii) Dentons US LLP, 1221 Avenue of the Americas, New York, New York 10020-1089 (Attn: Scott J. Swerdloff, Esq. and Christine Vrettos, Esq.), attorneys for New Residential Investment Corp.; and (iv) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York

10014 (Attn: William K. Harrington, Esq., Susan D. Golden, Esq., and Andrea B. Schwartz, Esq.),
so as to be actually filed and received by no later than **September 18, 2017 at 4:00 p.m.**
(prevailing Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that the relief requested in the Motion may be
granted without a hearing if no objection is timely filed and served as set forth above and in
accordance with the order, dated June 17, 2010, implementing certain notice and case
management procedures in these cases (Docket No. 9635) (the “Case Management Order”).

Dated: September 7, 2017
New York, New York

Respectfully Submitted,

By: /s/ Paul V. Shalhoub
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